

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 25-5068
(Civ. A. No. 25-cv-00766)

J.G.G. *et al.*, Appellees

v.

DONALD TRUMP, et al. Appellants

**MOTION FOR LEAVE TO FILE BRIEF OF THE HON. BRANDON GILL AS
AMICUS CURIAE IN SUPPORT OF APPELLANTS¹**

Pursuant to Federal Rule of Appellate Procedure 29, proposed *amicus curiae* Brandon Gill hereby submits this motion for leave to file the attached amicus brief in support of Appellants. Representative Brandon Gill is the sitting United States Representative for Texas’ 26th Congressional District and he currently sits on the House Committee on the Judiciary, and the Subcommittee on Immigration Integrity, Security, and Enforcement. *See Representative Brandon Gill*, CONGRESS.GOV, <https://perma.cc/T5L3-J6Q8> (last visited Mar. 19, 2025).

“An amicus brief should normally be allowed ... when the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008). This *amicus* brief is especially desirable here because

¹ The undersigned certifies that no party’s counsel authored this brief in whole or in part, and that no party, party’s counsel, or any other person other than *amicus* contributed money that was intended to fund preparing or submitting this brief.

Representative Gill currently sits on two committees with relevant jurisdiction over this issue, giving him a unique insight that can help this Court understand the interbranch dynamics relevant to the case.

Counsel for proposed *amicus* has contacted counsel for the parties to seek their position on the filing. Counsel for Appellants consented, and Counsel for Appellees did not respond before the time of filing. A copy of the proposed brief has been submitted with this motion.

Dated: March 21, 2025
Washington, DC

Respectfully submitted,
/s/ Jacob Meckler
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